

**STATE OF MICHIGAN  
IN THE BUSINESS COURT FOR THE COUNTY OF OAKLAND**

**AXLE OF DEARBORN, INC., D.B.A.**  
**DETROIT AXLE**, a Michigan corporation;  
**DETROIT AXLE, INC.**, a Michigan corporation;  
and **DETROIT AXLE QSSS, INC.**, a Michigan  
corporation,

Case No. 20-                    -CB  
Hon.

Plaintiffs,

v.

**DETROIT IT, LLC**, a Michigan limited  
liability company and **ERIC GRUNDLEHNER**,  
an individual,

Defendants.

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Jonathan H. Schwartz (P70819)  
Jonathan E. Sriro (P52100)  
Benjamin M. Low (P82834)  
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**Affidavit of Dan Mayer**

STATE OF MICHIGAN        }  
                                      } ss  
COUNTY OF OAKLAND    }

I, DAN MAYER, of full age, being duly sworn according to law, upon his oath, deposes  
and says:

1. I am the Chief Technology Officer for Auxiom.
2. Auxiom is Detroit Axle's IT services provider.

3. Detroit Axle's network and computer systems are under the control of Detroit IT, whom have been dismissed as the provider of Detroit Axle's IT services, and Detroit Axle has lost access to much of the administrative functions of its IT infrastructure.

4. Detroit IT's control of Detroit Axle's network and computer systems have made us, as Detroit Axle's IT services provider, unable to assist Detroit Axle with supporting its IT infrastructure, which negates our ability to support its operations.

5. The current situation with Detroit Axle's IT infrastructure puts Detroit Axle's operations at risk, as we cannot validate that their current security is sufficient to protect their operations from cyber attacks and other network intrusions.

6. We are unable to resolve existing IT issues that are present in Detroit Axle's network and computer environment, including, but not limited to printer issues and internet issues due to the lack of access that Detroit Axle has for its network and computer systems.

7. We are unable to install new software, or update current software, onto Detroit Axle's network and computer systems due to these issues, which leaves Detroit Axle open to vulnerabilities.

8. Should Detroit Axle's firewalls in control of Detroit IT fail or get deactivated, neither Detroit Axle nor us, as Detroit Axle's IT services provider, would be able to fix its firewall, nor troubleshoot or investigate any issues.

9. It is our understanding that other vendors, including, but not limited to, GNT Consulting is no longer able to access Detroit Axle database in order to support Detroit Axle.

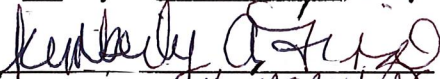
10. Detroit Axle is currently unable to fully access its servers or make changes in its servers.

FURTHER AFFIANT SAYETH NOT.

  
DAN MAYER

Subscribed and sworn before me

this 22 day of January, 2020

  
Printed Name: KIMBERLY A. FINZEL

Notary Public

County of Wayne State of Michigan

Acting in the County of Oakland

My Commission Expires: 3/24/21